

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SERHAT DANIEL GUMRUKCU,

Defendant.

Case No. 22-cr-58

**UNOPPOSED MOTION TO EXTEND  
DEADLINE RE CHALLENGES TO EXPERT  
NOTICES**

Serhat Gumrukcu, by and through his attorneys, moves to extend the deadline to present challenges and/or objections to the Government's notices of expert testimony until June 7, 2023. On May 1, 2024, the government provided notice that it would call seven experts at trial. The parties are in the midst of conferring on the sufficiency of those notices, and Dr. Gumrukcu as requested additional information regarding the same. The Court's scheduling order currently requires the filing of any such challenges and/or objections on May 31, 2024. *See* Dkt. 102.

To provide the parties additional time to confer regarding the Government's notices, with the goal of at least narrowing, if not eliminating, the need for motion practice and other challenges relating to the Government's notice, Dr. Gumrukcu respectfully moves the Court for a one-week extension to permit the filing of any such challenges and/or objections until June 7, 2024. Defense counsel has conferred with the United States with respect to this motion, and Assistant United States Attorney Paul Van de Graaf has informed counsel that the Government does not object to the granting of this motion.

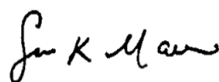
For these reasons, Dr. Gumrukcu respectfully moves the Court to grant the one-week extension of time. Dr. Gumrukcu notes that the Speedy Trial clock in this matter has excluded

time until October 7, 2024, *viz.*, after the commencement of trial under the current schedule. *See* Dkt. 104, 172. Accordingly, the granting of this motion will not affect the Speedy Trial clock nor the timely commencement of trial.

Respectfully submitted,

DATED this 30<sup>th</sup> day of May, 2024.

LAW FIRM OF SUSAN K MARCUS, LLC

A handwritten signature in black ink, appearing to read "Susan K. Marcus".

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